

**DECLARATION OF
DOROTHY ROSENSWEIG, ESQ.
EXHIBIT F**

Dorothy Rosensweig
Anna A. Cohen
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New York, New York 10177-0077
(212) 351-4500
Attorneys for Defendant

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X		
LIZABETH J. AUGUSTINE,	:	ECF CASE
	:	
Plaintiff,	:	
	:	
- against -	:	Case No. 07 Civ. 8362 (RWS)(DFE)
	:	
AXA FINANCIAL, INC. d/b/a AXA	:	
EQUITABLE LIFE INSURANCE CO.,	:	
	:	
Defendant	:	
----- X		

**DEFENDANT'S ANSWERS AND OBJECTIONS
TO PLAINTIFF'S FIRST SET OF
INTERROGATORIES TO DEFENDANT**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and Rules 26.3 and 33.3 of the Local Civil Rules of the United States District Court for the Southern District of New York, Defendant AXA Equitable Life Insurance Company (incorrectly referenced in the caption as "AXA Financial, Inc., d/b/a AXA Equitable Life Insurance Co.") (hereinafter "AXA") hereby responds to plaintiff's First Set of Interrogatories. The responses set forth herein are made without waiving the following:

1. Defendant's right to object on the grounds of competency, privilege, relevancy, materiality, or any other proper ground, to the use of any information that may

Interrogatory No. 7:

Set forth all reasons Defendant had for terminating Plaintiff's employment with Defendant.

Response to Interrogatory No. 7:

Defendant objects to Interrogatory No. 7 on the ground that it seeks information beyond the scope of what is permitted by Rule 33.3 of the Local Civil Rules of the United States District Court for the Southern District of New York. Accordingly, as discussed and agreed to in the parties' telephone conference on January 15, 2008, Defendant will not respond to this Interrogatory.

Interrogatory No. 8:

Please set forth all individuals (by name, position held at the time and current position, if different) that participated in the decision-making process to terminate Plaintiff's employment with Defendant.

Response to Interrogatory No. 8:

- a. James C. Dennis – Senior Vice President, Customer Marketing Group
- b. Jeanne O'Connor – Vice President, Customer Acquisition, Cross-Sales and Retention, Customer Marketing Group
- c. Cindy Stern, at the time Vice President Customer Retention & Cross Sales, currently Vice President Strategy and Insights

The above individuals are current managers/employees of Defendant, and may be contacted through Defendant's counsel.

Response to Interrogatory No. 22:

Defendant objects to Interrogatory No. 22 on the ground that it seeks information beyond the scope of what is permitted by Rule 33.3 of the Local Civil Rules of the United States District Court for the Southern District of New York. Defendant further objects to Interrogatory No. 22 on the basis that it is premature under the Federal Rules of Civil Procedure. Accordingly, as discussed and agreed to in the parties' telephone conference on January 15, 2008, Defendant will not respond to this Interrogatory.

Interrogatory No. 23:

If you contend that Plaintiff's request for FMLA leave was inadequate, insufficient, faulty and/or incomplete, please set forth all reasons supporting your contention.

Response to Interrogatory No. 23:

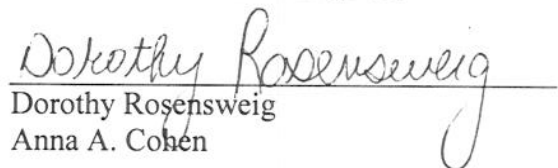
Defendant objects to Interrogatory No. 23 on the ground that it seeks information beyond the scope of what is permitted by Rule 33.3 of the Local Civil Rules of the United States District Court for the Southern District of New York. Accordingly, as discussed and agreed to in the parties' telephone conference on January 15, 2008, Defendant will not respond to this Interrogatory.

New York, New York
February 26, 2008

As to Objections Only:

EPSTEIN BECKER & GREEN, P.C.

By:


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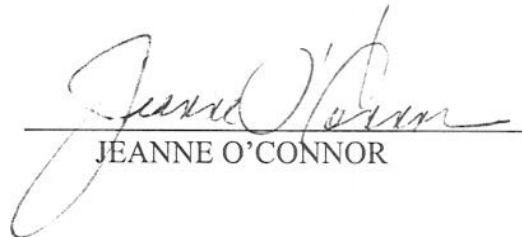
AS TO THE RESPONSES TO INTERROGATORIES:

VERIFICATION

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Jeanne O'Connor, being duly sworn, deposes and says:

I am a Vice President, Customer Acquisition, Cross-Sales and Retention, Customer Marketing Group of Defendant AXA Equitable Life Insurance Company. In that capacity, I have read and reviewed the foregoing responses to Plaintiff's First Set of Interrogatories and know the contents thereof; and the same are true to the best of my knowledge. The grounds for my belief are as follows: personal knowledge, company records, correspondence and other writings as well as communications with other company employees.


JEANNE O'CONNOR

Sworn to before me this
21st day of February, 2008


Notary Public

JILL C. RAFALOFF
NOTARY PUBLIC, State of New York
No. 41-4967048
Qualified in Queens County
Commission Expires May 21, 2010